

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DENISSE MUNIZ,		
Plaintiff,		
v.		
FENIX INTERNATIONAL LIMITED,		CIVIL ACTION NO.
		1:20-CV-3200-LMM
Defendant.		

NOTICE OF FILING TO STATE PARTIES' CITIZENSHIPS

Plaintiff, DENISSE MUNIZ, files this notice stating the citizenships of the following parties: (1) Denisse Muniz; (2) Fenix International Limited; and (3) Fenix Internet, LLC.

Ms. Muniz is a both a resident and citizen of the United States and the state of Georgia. Her permanent address is in Georgia, and she plans to reside there permanently as she pursues her career, satisfying the citizenship requirement outlined in caselaw. See McCormick v. Aderholt, 293 F.3d 1254, 1257-58 (11th Cir. 2002) (quoting Mas v. Perry, 489 F.2d 1396, 1399 (5th Cir. 1974)).

Fenix International Limited (“FIL”) was incorporated on September 1, 2016 with an address at Whitmore Crescent Chelmsford, United Kingdom, CM2 6YN. At the time of filing the registered address was that listed in the Complaint - 85, First Floor Great Portland Street London, England, W1W 7LT (“Great Portland”). Days after the Complaint was filed, Defendant changed their registered address to 4th Floor Imperial House 8 Kean Street London, WC2B 4AS (“Kean Street”).

FIL’s website still lists Great Portland as their contact address. The OnlyFans website lists Kean Street as the address for both FIL and Fenix Internet, LLC. There are two active corporate officers of FIL: Company Director and Secretary Guy Robert Stokely and Director Leonid Radvinsky. Both have Kean Street listed as a correspondence address. Because the office in London is the location that business inquiries are directed to and where the high-level officers manage and control FIL’s activities, this is the “nerve center” and principal place of business. See Hertz Corp. v. Friend, 559 U.S. 77, 80–81 (2010). Therefore, both their place of incorporation and their principal place of business are in the United Kingdom, satisfying the jurisdictional requirements of 28 U.S.C. § 1332(c).

Fenix Internet, LLC has a business address at 345 N Canal St, Suite C-202 Chicago, IL 60606 USA. Leonid Radvinsky, Director, and person of significant control of FIL as of September 7, 2020, lists that same Chicago address as a second correspondence address. Records indicate two recent personal residential

addresses: (1) 225 N COLUMBUS DR UNIT 8002, CHICAGO, IL 60601-5268 (COOK COUNTY) (11/05/2010 to 09/03/2020) and (2) 225 N COLUMBUS DR UNIT 8106, CHICAGO, IL 60601-5268 (COOK COUNTY) (04/08/2017 to 02/13/2020). Radvinsky, who owns 75% or more of the shares and voting rights of FIL, appears to be the sole member of Fenix Internet, LLC. Ms. Muniz's search produced no other listed members. If the Fenix Internet, LLC has other members, they are currently still in Defendant's possession. With Radvinsky as the sole member with a listed address matching that of the business address, Fenix Internet, LLC is a citizen of Illinois. See Rolling Greens MHP, L.P. v. Comcast SCH Holdings L.L.C., 374 F.3d 1020, 1022 (11th Cir. 2004).

The basis for diversity jurisdiction in this Court is met, because Ms. Muniz is a citizen and resident of Georgia, FIL was incorporated and retains its principal place of business in the United Kingdom, and Fenix Internet, LLC is a citizen of Illinois.

Respectfully submitted on this 11th day of September 2020.

/s/MARIO WILLIAMS
Mario B. Williams (Ga # 235254)

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared using Book Antiqua 13-point font in compliance with Local Rule 5.1.

/s/ Mario B. Williams
Mario B. Williams (Ga. # 235254)

CERTIFICATE OF SERVICE

I certify that on this date, a true and correct copy of the foregoing NOTICE OF FILING TO STATE PARTIES' CITIZENSHIPS has been served via electronic mail through the Court's CM/ECF system on all parties of record.

Respectfully submitted this 11th day of September 2020.

/s/MARIO WILLIAMS
Mario B. Williams (Ga # 235254)

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